



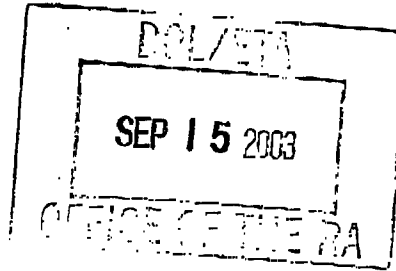
# LOUISIANA WORKS

DEPARTMENT OF LABOR

M.J. "Mike" Foster, Jr.  
Governor

Dawn Romero Watson  
Secretary

September 9, 2003



OFFICE OF THE SECRETARY

Joseph C. Juarez  
Regional Administrator  
Employment and Training Administration  
5252 Griffin Street, Room 317  
Dallas, TX 752202


Dear Mr. Juarez:

Enclosed is the State of Louisiana's request for a waiver under the Workforce Investment Act, Section 133-Transfer Authority of a Local Board, for PY 2003. We have addressed sections 20 CFR 661.420(c) and 189(i)(4) of the Workforce Investment Act- General Waivers of Statutory or Regulatory Requirements. The Training and Employment Guidance Letter referencing the development and submission of a request for the waiver of WIA was also followed.

The waiver request was submitted for public review and comment over the 30 day period required in the regulations. Copies of all comments received are herein enclosed.

If you have further questions, please contact Cecil Sandlin at (225) 342-7631.

Cordially,

  
Dawn Romero Watson  
Secretary

C: Sujuan M. Williams Boute'  
Chris Weaver

**STATE OF LOUISIANA  
WAIVER REQUEST  
WORKFORCE INVESTMENT ACT**

**Transfer of WIA Funds between Adult and Dislocated Worker Programs**

The Louisiana Department of Labor (LDOL), Office of Workforce Development (OWD), the State administrative entity for the Workforce Investment Act (WIA), is requesting a waiver of the legal requirement limiting transfer of funds between the Adult and Dislocated Worker programs to no more than 20% of a program year allocation. The waiver would provide the ability to transfer up to 40% of a program year allocation between these two programs. Should the waiver be granted, LDOL will be able to ensure that the critical workforce needs of local communities are met.

This waiver request follows the format identified in WIA Section 189(i)(4)(B) (29 USCA Section 2939(i)(4)(B) and WIA Final Regulations at 20 CFR Section 661.420(c).

1. **Statutory Regulations to be Waived:** WIA Section 133(b)(4) (29 USCA Section 2963(b)(4) and WIA Final Regulations at 20 CFR Section 667.140 provide that, with the approval of the governor, local Workforce Investment Boards (WIBs) may transfer up to 20% of a program year allocation for adult employment and training activities, and up to 20% of a program year allocation for dislocated worker employment and training activities between the two programs.

Louisiana's structure for the WIA consists of the Louisiana Department of Labor, Office of Workforce Development (OWD), which is responsible for providing the administrative and fiscal management systems for program implementation, and the State Workforce Commission, which performs policy functions. The planning and delivery of services is performed at the local level, embodying the Louisiana tradition of local control. A strong state and local partnership has resulted in the achievement of all 17 WIA performance measures for PY01 and the current effort to meet all performance outcomes for PY02.

During PY01, the number of Dislocated Worker enrollments increased by 55% compared with PY00, and Adult enrollments increased by 109% owing to the general downturn in the economy and the aftermath of 9/11. This trend continued in PY 02 compared with PY 01 as the Dislocated Worker enrollments increased by 33% and Adult enrollments increased by over 25%. Utilizing discretionary funding sources such as a National Emergency Grant and the Incumbent Worker Training program state initiative, Louisiana has been able to accommodate the needs of those additional clients who were victims of layoffs or potential layoffs. However, the resources for Adult services have decreased overall and local Boards are facing tough decisions regarding staffing and service levels in their Adult programs. Maximum flexibility with regard to allocation of funds would assist in assuring that both dislocated worker and adult services are maintained at a level sufficient to meet the needs of Louisiana's workforce.

2. **State or Local Statutory Regulatory Barriers:** There are no state or local statutory or regulatory barriers to implementing the proposed waiver. State Workforce Commission and LDOL policies are in compliance with current Federal guidelines. The Louisiana Workforce Commission has approved this request for waiver during the August 2003 meeting. Upon notification of approval of this waiver request, LDOL policy will be amended to comply with the terms of the waiver.

3. **Goals to be Achieved by the Waiver:**

- Improve the ability of local Boards to respond to changes within their local areas;
- Increase local control for program delivery;
- Increase employer/board collaboration to address industry needs and worker training;
- Increase accountability of local service providers;
- Provide greater flexibility to local Boards in designing and implementing WIA programs.

4. **Programmatic Outcomes to be Achieved by the Waiver:** Local Boards have exercised the option under the WIA to transfer up to 20% of funds. However, by virtue of Louisiana's diverse population, as well as differences in urban and rural workforce demographics, WIA customer needs vary greatly from one local region to another. Increased flexibility and control to transfer funds between the Adult and Dislocated Worker programs would allow each region to further customize service delivery and maximize use of limited funds.

The role of local Boards is to plan, oversee, and evaluate the delivery of workforce training and services delivered by their local One-Stop Centers. Boards need to be encouraged to design innovative programs unique to local needs and priorities. Such customized programs result in increased local and service provider accountability. LDOL, OWD, and the State Workforce Commission support the local Boards in these efforts by providing continued technical assistance and oversight. The granting of the waiver will allow Louisiana to continue to meet its goal of "building a skilled, internationally competitive workforce for the new century."

5. **Individuals Impacted by the Waiver:** This waiver will benefit local Boards, One-Stop Centers, employers, customers, and service providers. The following are expected to be additional impacts of the proposed waiver:

- Program participants will benefit because local Boards will have added flexibility to design programs based on local needs and priorities.
- More customers will have access to core, intensive, and training services.
- Boards will have added flexibility to move funds where they are needed.

6. **Process Used to Monitor Progress in Implementing the Waiver:** LDOL has a Federally recognized monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Louisiana's network of

One-Stop Centers. On a monthly and quarterly basis, LDOL reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, State program advisors conduct quarterly technical assistance reviews designed to assure that contract requirements are being met for all WIA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite, utilizing outcome reports generated from LDOL's statewide database. Should this waiver request be granted, LDOL will ensure regular review of the Adult and Dislocated Worker programs to monitor outcomes and impacts of the additional fund transfer authority.

7. **Process for Notice of Local Boards and Opportunity to Comment:** LDOL actively sought the input of local Boards during the development of the waiver request. Over a period of several months, LDOL met with local directors to review their expenditure levels and program needs, and ultimately received unanimous support for the submission of this waiver. The waiver request was published in the Legal Notices section July 25<sup>th</sup> and July 30<sup>th</sup>, 2003, in newspapers statewide, allowing for public comment on its content and potential impact. The waiver request was presented to the Workforce Commission for comment during the August 2003 meeting.

# The Times

## PROOF OF PUBLICATION

### NOTICE OF REQUEST FOR WAIVER

The Louisiana Department of Labor, the state administrative entity for the Workforce Investment Act hereby gives notice that it is seeking a waiver of the legal requirement limiting transfer of funds between the Adult and Dislocated Worker programs to no more than 20% of a program year allocation. The waiver would provide the ability to transfer up to 40% of program year allocation between these two programs. This would enable LDOL to ensure that the needs of local communities are met.

Comments should be mailed or emailed to Sandra Simmons, Workforce Investment Act Program Manager, Louisiana Department of Labor, 1001 North 23rd Street, Baton Rouge, Louisiana 70804, a m a i l : ssimmons@ldol.state.la.us prior to August 30, 2003.

The Times:  
July 25, 30, 2003

### STATE OF LOUISIANA PARISH OF CADDO

Before me, the undersigned authority, personally came and appeared

Altheas Critton,

personally known to me,

Who being duly sworn, deposes and says that she is the Assistant to the Classified Advertising Manager of The Times, and that the attached Advertisement entitled:

NOTICE OF REQUEST FOR WAIVER The Louisiana Department of Labor, the state administrative entity for the Workforce Investment Act hereby gives notice that it is seeking a waiver of the legal requirement limiting transfer of funds between the adult and Dislocated Worker programs

As per copy of advertisement hereto annexed, was published in The Times on the following dates to wit:

July 25 & 30, 2003

(Signed)

Altheas Critton

Sworn to and subscribed before me this 30<sup>th</sup> day of July 2003.

Althea C Goodwin

(Notary)

ALTHEA C. GOODWIN, NOTARY PUBLIC  
BOSSIER PARISH, LOUISIANA  
MY COMMISSION IS FOR LIFE

R - AUG 04 2003





# RIVER PARISHES WORKFORCE INVESTMENT BOARD

Local Workforce Investment Area #14

P.O. Box 1010 • Hahnville, Louisiana 70057 Phone (985) 783-5034 • Fax (985) 785-8372

June 24, 2003

Ms. Sandra Simmons  
WIA Program Manager  
Office of Workforce Development  
P.O. Box 94094  
Baton Rouge, Louisiana 70804-9094

Dear Sandra,

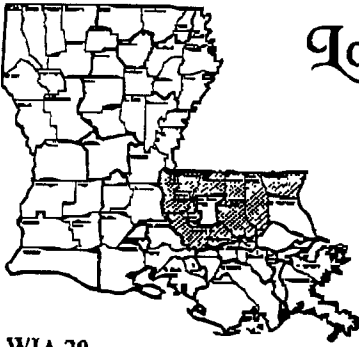
The following is the opinion of the River Parishes Workforce Investment Board, Local Workforce Investment Area #14, regarding transference between Adult and Dislocated Worker Program funds. We would consider the increase from 20% to up to 40% as a positive avenue towards increasing expenditures as well as increasing the flexibility of the local areas to design their programs to meet the needs of job seekers and employers in their respective areas.

If you need any other information regarding this issue please do not hesitate to call me.

Sincerely,

Sharon G. Simpkins  
Workforce Investment Act Program  
Board Director

R JUN 26 2003



# Local Workforce Investment Board

## WIA - 20

*Sandra  
Cecil*

1745 Southwest Railroad Avenue, Suite 201  
Hammond, LA 70403

1-800-257-0270

June 23, 2003

### LWIA 20

Ascension  
East Feliciana  
Iberville  
Livingston  
Pointe Coupee  
St. Helena  
Tangipahoa  
Washington  
West Baton Rouge  
West Feliciana

Ms. Sujuan M. Williams Boutte'  
Assistant Secretary of Labor  
Louisiana Department of Labor  
Post Office Box 94094  
Baton Rouge, Louisiana 70804-9094

Dear Ms. Boutte':

The approval of the 40% transfer of funds from the Dislocated Workers Program to the Adults Program would greatly increase our ability to meet our expenditure requirements for dislocated workers.

The eligible adult customer requiring services from Local Workforce Investment Area 20 out numbers the dislocated worker, and our adult funds are not sufficient to serve this population. The transfer would enable us to serve more disadvantaged adults and still maintain sufficient funds for dislocated workers.

If you need additional information, please feel free to contact this office. Your prompt attention would be appreciated.

Sincerely,

Gloria Abels  
WIB Administrator - WIA 20

/cf

**RECEIVED**  
JUN 26 2003  
LDOL / OWE

*Joelle*



Office of the Mayor-President  
City of Baton Rouge  
Parish of East Baton Rouge

Workforce Investment Area 21  
Administrative Office  
4523 Plank Road  
Baton Rouge, Louisiana 70805

Sidney M. Longwell  
Director

225/358-4579  
Phone

225/358-8610  
Fax

June 23, 2003

Ms. Sujuan Williams Boutte  
Assistant Secretary  
Louisiana Department of Labor  
Office of Workforce Development  
Post Office Box 94094  
Baton Rouge, LA 70804-9094

Dear Ms. Boutte:

**RE: WAIVER AUTHORITY TO TRANSFER FUNDS**

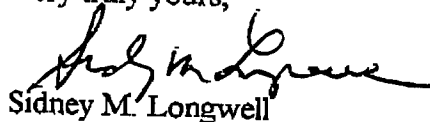
At the June 5, 2003 meeting of the Louisiana Workforce Commission, the Commission approved a recommendation by the Louisiana Department of Labor to submit a request for a waiver of the legal requirement limiting transfer of funds between Adult and Dislocated Worker programs. The 20% limit would increase to 40%.

Workforce Investment Area 21 would like to go on record as supporting this recommendation to increase the percentage to 40%. This would give us the flexibility to best utilize our funds to match the local needs of job seekers.

We support this requirement and urge the U.S. Department of Labor to approve this increase.

Thank you in advance for your cooperation in this matter.

Very truly yours,

  
Sidney M. Longwell

Workforce Investment Administrative Director

/s/

c: Paul Thompson, CAO, Mayor's Office  
Isaiah Marshall, Assistant Director  
Alice Toombs, WIA Program Director

**RECEIVED**  
JUN 26 2003  
LDOL / OWD



**LAT**

*Sandra  
Cull*

**Workforce Investment Board, Inc.**

911 Bond Street • P. O. Box 4115 • Houma, LA 70361

Phone: (985) 580-7249 • Fax: (985) 580-7248

June 24, 2003

Ms. Sujuan M. Williams Boutte'  
Assistant Secretary of Labor  
Louisiana Department of Labor  
P.O. Box 94094  
Baton Rouge, LA 70804-9094

Dear Ms. Boutte':

The LAT Workforce Investment Board is requesting the state to consider allowing the transferal of 40% Dislocated Worker funds to Adult funds in lieu of the traditional 20% it has allowed in the past.

In accordance to past expenditures, the transferring of 40% Dislocated Worker funds to Adult funds would allow the local area to spend more appropriate as the Adult expenditures always exceed the Dislocated Worker expenditures.

The transfer of 40% Dislocated Worker funds to Adult funds would adequately serve our most demanding customers. This region is currently experiencing problems in enrolling Dislocated Workers due to the low unemployment rate. Therefore, it would be appropriate to increase the transfer amount to 40% and allow our region to serve more customers.

Sincerely,




Frank Lewis  
af

cc: Ms. Sandra Simmons

**RECEIVED**  
JUN 26 2003  
LDOL / OWD

Will Langlinais  
Chief Elected Official

Ronald Buschel, President  
St. Landry Parish Police Jury  
Grant Recipient

  
**LOUISIANA  
WORKS**  
WORKFORCE  
INVESTMENT BOARD  
LWIA #40  
242 West Bloch Street  
P.O. Box 2046 - Opelousas, La 70571-2046  
Phone (337) 942-5678 Fax (337) 942-9654

*Jan Cecil*  
Chris Dunbar  
Administrator

Donna Deguevter-Morris  
Assistant Administrator

Wayne Taylor  
Chairman

Hank Capel  
Vice-Chairman

Clarence Moss  
Parliamentarian/Secretary

June 23, 2003

Sujuan Boutte', Assistant Secretary  
Louisiana Department of Labor  
P.O. Box 94094  
Baton Rouge, LA 70804-9094

Dear Sujuan:

Please be advised that LWIA#40 supports the option to transfer 40% of the Dislocated Worker funds to the Adult Program category.

Please contact me if additional information is need.

Sincerely,

*Chris Dunbar*

Chris Dunbar  
WIB Administrator

**RECEIVED**  
JUN 26 2003  
LDOL / OWD

**LAFAYETTE  
CONSOLIDATED  
GOVERNMENT**



ADMINISTRATIVE SERVICES DEPARTMENT

WIB DIVISION

P. O. BOX 4017-C  
LAFAYETTE, LOUISIANA 70502  
TEL: (337) 291-7152  
FAX: (337) 291-7113

June 24, 2003

**Sandra Simmons  
Louisiana Department of Labor  
Post Office Box 94094  
Baton Rouge, LA 70804-9094**

Dear Sandra,

As you are aware, the needs of companies can change very rapidly. These changes can lead to the unemployment of workers in unpredictable numbers, and these numbers can be large enough to bring about funding issues. There needed to be a better way to control funding on the local level and the ability to transfer 40% of funding between Adult and Dislocated funds is one solution.

I would like to acknowledge the Louisiana Department of Labor for the great work you do in assuring that Louisiana will continue to develop its workforce to meet the needs of its companies. Further substantiating this, is the passage of an Action Item by the Louisiana Workforce Commission on 6/5/03 that allowed LDOL to submit a Statutory Waiver Request to allow the transfer of up to 40% of a program year allocation between the Adult and Dislocated Worker program funds.

The Lafayette Workforce Investment Area endorses this waiver for the betterment of its program and its participants. Our area has been subject to major layoffs with several companies each having between 50-300 employees. This waiver will allow local flexibility to accommodate the changing workforce by moving funding where it is needed most. This waiver would, most importantly, allow us to better serve our future participants.

Sincerely,

**Glenn Dugas  
Executive Director**

**R** JUN 26 2003

~ LWIA 50 ~  
**WORKFORCE INVESTMENT BOARD**  
808 WEST FIRST STREET • DE RIDDER, LOUISIANA 70634

Phone: (337) 460-1310  
Fax: (337) 460-1312  
E-mail: lwia50.wib@wnonline.net

June 24, 2003

Ms. Sandra Simmons  
LA Department of Labor  
P.O. Box 94094  
Baton Rouge, LA 70804-9094

Dear Ms. Simmons:

The intent of this correspondence is to inform you that I am in favor of the proposed waiver to allow for the transfer of up to 40% of Dislocated Worker funds to Adult programs. A review of the LWIA 50 budget indicates a greater need for funds to serve Adult clients than for funds to serve Dislocated Worker clients. The 40% transfer option would be an excellent opportunity to enable this area to serve more adult clients.

If there is any additional information you may need, please feel free to contact me at 337-460-1310/460-1311.

Sincerely,



Shirley Slaydon  
WIB Director/Planner

SAS:jf

CC: Becky Moreau  
Patricia Brown

**R** JUN 26 2003



**C A L C A S I E U P A R I S H P O L I C E J U R Y**  
GOVERNING AUTHORITY OF CALCASIEU PARISH, LOUISIANA

**Workforce Investment Board**  
P.O. Box 1592  
909 Lakeshore Drive  
Lake Charles, Louisiana 70602-1592  
337/437-3284  
Fax 337/437-3814  
TDD 1-800-947-5277 or 711  
Email [jAugustine@structurex.net](mailto:jAugustine@structurex.net)  
[www.cppi.net](http://www.cppi.net)

June 24, 2003

Ms. Sandra Simmons  
WIA Executive Management Officer  
Louisiana Department of Labor  
P. O. Box 94094  
Baton Rouge, LA 70804-9094

Dear Ms. Simmons:

This is to advise that LWIA #51 is in favor of the proposed wavier that would allow the transfer of up to 40% of the Dislocated Worker Funds to the Adult Funds. This would give added flexibility to spend funds where they are needed most. Gencrally, we spend more funds on adult participants and need additional funds.

Like many of the other local workforce areas, we have experienced some difficulty in spending our Dislocated Worker funds. We are currently waiting on a response to our request (May 1, 2003) to transfer 20% of our Dislocated Worker funds to the Adult funds before the end of this program year. We welcome any assistance that will allow us to serve additional adult participants.

Please advise if additional information is needed.

Sincerely,

*Jean M. Augustine*  
Jean M. Augustine, WIB Director

Serving:

## Local Workforce Investment Board of Area 60

Avoyelles  
Catahoula  
Concordia  
Grant  
LaSalle  
& Winn  
Parishes

LaSalle Parish Courthouse  
1050 Courthouse Street  
Room 25  
P.O. Box 53  
Jena, Louisiana 71342  
Phone: 318-992-4328  
Fax: 318-992-8750

June 24, 2003

Ms. Sandra Simmons  
Louisiana Department of Labor  
Baton Rouge, LA 70804

Dear Ms. Simmons:

We at LWIA-60 are in favor of the waiver as long as it remains an option for our organization. In the past we have had difficulty spending DWL money and if we had the option to transfer up to 40%, it could allow us to serve more people.

Sincerely,



Robert Day

R  
JUN 26 2003 L

An Equal Opportunity Employer/Program  
Auxiliary Aids and Services Available On Request  
To Individuals With Disabilities  
LRS# 1-800-846-5277 (TDD)  
LRS# 1-800-947-5277 (VOICE)



## WORKFORCE OPERATIONS DEPARTMENT

Felix Mouton, Jr.  
Director

5610-B COLISEUM BLVD.

ALEXANDRIA, LA 71303

Telephone (318) 767-6030  
Fax (318) 767-6046

### MEMORANDUM

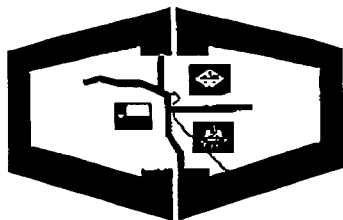
June 24, 2003

To: Sandra Simmons, WIA Coordinator  
LA Department of Labor

From: Felix Mouton, Jr., Director  
Workforce Operations Department

Re: Transfer Waiver

We would definitely favor a waiver to allow an increase in the percentage of funds allowed to be transferred from the dislocated worker to the adult category from 20% to 40%. It has been difficult to spend dislocated worker funds and this would allow us to serve more participants without any adverse effect on dislocated workers.



**THE  
COORDINATING & DEVELOPMENT CORPORATION**

5210 Hollywood Avenue • P. O. Box 37005 • Shreveport, Louisiana 71133-7005  
Phone/TDD: (318) 632-2022 • Fax: (318) 632-2099 • E-mail: [info@cdconline.org](mailto:info@cdconline.org)  
Internet: [www.cdconline.org](http://www.cdconline.org)

**M. D. LeComte, CED, ED**  
President & CEO

*June 25, 2003*

*Ms. Sandra Simmons  
LDOL, Executive Management Officer  
1001 N. 23rd Street  
P. O. Box 94094  
Baton Rouge, LA 70804-9094*

*Dear Ms. Simmons:*

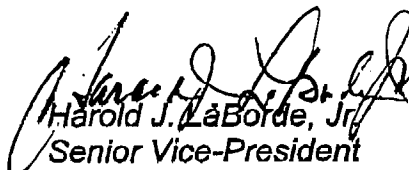
*This letter is in response to your question regarding the request to allow the transfer of 40% Dislocated Worker funds to the Adult program.*

*I am very much in favor of this request because it would give more flexibility at the local level.*

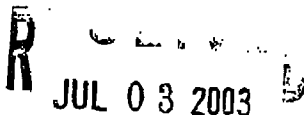
*Most Dislocated Workers want to return to work as soon as possible and can be served through Core and Intensive Services, so more expensive long-term training is not necessary. Therefore, fewer funds are needed to serve them.*

*I hope this information will help in your request to the U. S. Department of Labor and if I can be of further assistance, please let me know.*

*Sincerely,*

  
Harold J. LaBorde, Jr.  
Senior Vice-President

HJL:sb

  
JUL 03 2003





## CITY OF SHREVEPORT

P.O. BOX 31109 SHREVEPORT, LA 71130  
web site: [www.ci.shreveport.la.us](http://www.ci.shreveport.la.us)

June 24, 2003

Ms. Sandra Simmons  
WIA Coordinator  
Louisiana Department of Labor  
P.O. Box 94094  
Shreveport, Louisiana 70804

Dear Sandra:

This letter is to advise you my favorable approval of the 40% proposed transfer of Dislocated Worker funds to the Adult funding stream. This would provide more flexibility in our budget process. If Dislocated Worker funds were underutilized, this adjustment would also help to offset that factor as well as increase adult registration and customer services. There would be no adverse impact on the clients at large.

Please let me if additional information is needed. You may reach me at (318) 673-7540.

Sincerely,

A handwritten signature in black ink, appearing to read "Herman Vital", with a large, stylized flourish at the end.

Herman Vital, Bureau Chief  
Workforce Development

cc. Ms. Nelda Altimus, WIA Advisor





# Workforce Investment Board

Results, Not Excuses

Area 81

Ouachita Parish Police Jury Workforce Investment Board • 1333 State Farm Drive • Monroe, LA 71202  
318-651-7025 • Fax: 318-398-7427

June 24, 2003

This is the response to the email about Dislocated Workers funds:

Ouachita Parish Workforce would be in favor of the waiver. This would give us more flexibility to spend money where the demand is. It has been more difficult to spend the Dislocated Worker funds. Also, more participants could be served and more services could be provided if a larger portion of these funds could be transferred.

Thank you,

Doretha Bennett  
LWIA 81 Director



# UNION COMMUNITY ACTION ASSO., INC.

CHARLES H. KELLEY  
DIRECTOR

PH. (318) 368-9606  
FAX (318) 368-2842

P.O. BOX 520  
FARMERVILLE, LA. 71241-0520

June 24, 2003

Ms. Sujuan M. Williams Boute', Assistant Secretary  
Office of Workforce Development  
La. Department of Labor  
P. O. Box 94094  
Baton Rouge, Louisiana 70804-9094

Attention: Ms Sandra Simmons

Dear Sujuan:

RE: Waiver on Transfer of Funds

In accordance with the Workforce Investment Act (WIA), LWIA 82 is requesting that a waiver be submitted which would allow the local workforce investment boards to give consideration to the transfer of an amount up to 40% of Dislocated Worker Funds to the Adult Program. By allowing this option, the LWIAs could more effectively meet the needs at the local level and expense the funds where the need exists.

If you need additional information, please contact this office.

Yours truly,

*Sandra R. Crane, CPB*  
*Deputy Director*  
for Charles H. Kelley  
Executive Director

CHK:lrc

FAXed June 24, 2003  
(225) 342-7664

*"An Equal Opportunity-Affirmative Action Employer"*



# WORKFORCE INVESTMENT BOARD

## SDA-83, INC.

Post Office Box 14269 • 1504 Stubbs Avenue • Monroe, Louisiana 71207 • Office (318) 387-7962 • Fax (318) 361-0279

June 24, 2003

Ms. Sandra Simmons  
Louisiana Department of Labor  
Post Office Box 94094  
Baton Rouge, Louisiana 70804-9094

Dear Ms. Simmons:

LWIA-83 is in favor of the proposed waiver to allow up to 40% of Dislocated Worker Funds to be transferred to adult programs. This waiver will allow for increased flexibility and allow local LWIA's to target the funds in areas where demand is highest.

Sincerely,

  
C.W. Frazier, Jr.  
Executive Director

CWF:jm